



Order 98-8-23
Served August 20, 1998

**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

Issued by the Department of Transportation
on the 19th day of August, 1998

Application of

SHUTTLE AMERICA CORPORATION

Docket OST-98-3876

for a certificate of public convenience and necessity under
49 U.S.C. 41102 to engage in interstate scheduled air
transportation of persons, property, and mail

**ORDER TO SHOW CAUSE
PROPOSING ISSUANCE OF CERTIFICATE AUTHORITY**

Summary

By this order, we tentatively find that Shuttle America Corporation is fit, willing, and able to provide interstate scheduled air transportation of persons, property, and mail as a certificated air carrier.

Background

Section 41102 of Title 49 of the United States Code (Transportation) ("the statute") directs us to determine whether applicants for certificate authority to provide interstate scheduled air transportation are "fit, willing, and able" to perform such transportation, and to comply with the statute and the regulations of the Department. In making fitness findings, the Department uses a three-part test that reconciles the Airline Deregulation Act's liberal entry policy with Congress' concern for operational safety and consumer protection. The three areas of inquiry that must be addressed in order to determine a company's fitness are whether the applicant (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) will have access to resources sufficient to commence operations without posing an undue risk to consumers, and (3) will comply with the statute and regulations imposed by Federal and State agencies. We must also find that the applicant is a U.S. citizen.

On May 22, 1998, Shuttle America Corporation filed an application in Docket OST-98-3876 for a certificate to provide interstate scheduled air transportation of persons, property, and mail pursuant to section 41102. Shuttle America accompanied its application with the fitness information required by section 204.3 of our regulations.¹

No answers opposing Shuttle America's application were filed and no special issues regarding the applicant have come to our attention. Under these circumstances, we propose to decide the issue of the applicant's fitness on the basis of the written record, and we tentatively conclude that Shuttle America is a U.S. citizen and is fit, willing, and able to operate its proposed interstate scheduled passenger service. However, we will give interested persons an opportunity to show cause why we should not adopt as final the tentative findings and conclusions stated herein.

The Company

Shuttle America was organized as a corporation under the laws of the State of Delaware in January 1996.² Its ownership is currently divided between twenty-two common and nine preferred stockholders. The only individual holding more than ten percent of the common stock issued is Mr. David F. Hackett, the company's founder, President and Chief Executive Officer, with 40.5 percent of the common stock issued.³ Shuttle America's preferred stock is convertible into common stock at a 1:1,000 exchange rate and each share of preferred stock is entitled to vote as if such stock had been converted to common (*i.e.*, 1,000 votes per share). All of the preferred stock authorized (5,250 shares) has been issued and is held by Lawrence, Smith & Horey III, a limited partnership (57.1 percent), Mr. Richard B. Steele (14.3 percent), CIBC Wood Gundy Capital Ventures, a citizen of Canada (14.3 percent), Air Shuttle Ventures (13.3 percent), and five other individuals (1.0 percent). In addition, warrants for common stock have been issued with Lawrence, Smith & Horey III holding 45.0 percent and the Connecticut Development Authority holding 55.0 percent. Assuming all outstanding warrants are exercised and all preferred stock is converted to common stock, Shuttle America's ownership would be distributed between Lawrence, Smith & Horey III (44.9 percent), Richard B. Steele (9.4 percent), CIBC Wood Gundy Capital Ventures (9.4 percent), Connecticut Development Authority (9.1 percent), Air Shuttle Ventures (8.7 percent), David F. Hackett (7.5 percent), and 26 other investors as a group (11.0 percent).

Shuttle America's Board of Directors is comprised of Mr. Larry J. Lawrence, Chairman of the Board, Ms. Jennifer C. Balbach, Mr. David F. Hackett, President and Chief Executive Officer, and Mr. Donald G. Reed. Messrs. Lawrence and Reed and Ms. Balbach are each representatives of major U.S. citizen investors in Shuttle America.⁴

¹ Shuttle America filed information supplementing its application on July 10, 1998.

² The applicant was originally incorporated under the name "National Air Shuttle, Inc." However, in August 1996 its name was changed to "Shuttle America Corporation."

³ 1.48 million of the 8.43 million shares of common stock authorized have been issued.

⁴ Mr. Lawrence is a General Partner of Lawrence, Smith & Horey III, a venture capital firm. Ms. Balbach is Vice President of Buffalo Ventures, an investment banking firm that is the parent of Air

Since its formation, the company has been in the developmental stage. If its application is approved, Shuttle America intends to provide short-haul, point-to-point air transportation, initially serving medium-sized cities and secondary airports of major cities in the Northeast and Mid-Atlantic states. It will utilize 50-seat Bombardier Dash 8-300 aircraft to conduct these operations.

Managerial Competence

Shuttle America's founder, Mr. David F. Hackett, serves as its President, Chief Executive Officer, and General Manager. Mr. Hackett began his career in aviation in 1985 as an analyst in the Financial Planning department of Continental Airlines. Mr. Hackett progressed through increasingly responsible positions to become Continental Airlines' Director of Financial Planning in March 1988. In July 1990, Mr. Hackett assumed the same position with Continental Airlines Holding where he remained until March 1991. After a brief period of time as a self-employed consultant, Mr. Hackett joined Savoy Capital, a private investment and advisory firm, as a managing director. In 1993, Mr. Hackett assumed the position of Senior Vice President of Planning with ATX, Inc., a developmental stage airline and, after that company failed to receive certificate authority from the Department, he returned to his managing director position at Savoy Capital where he remained until establishing the applicant in January 1996.

Mr. Gregory D. Aretakis has served as Shuttle America's Vice President of Marketing since April 1997. Mr. Aretakis began his career in aviation in 1979 as an analyst with American Airlines in its schedule planning department. In 1981, Mr. Aretakis left American Airlines and joined Texas International Airlines as Director-Schedule Planning. During the next 12 years, Mr. Aretakis held various senior positions with the Texas Air/Continental Airlines family of air carriers. In 1993, he left Continental Airlines to become Vice President-Marketing of ATX, Inc., and, later, a managing director of Savoy Capital.

Mr. R. Neil Schnaak, an Airline Transport Pilot with almost 15 years of experience, serves as Shuttle America's Vice President and Director of Operations. Immediately prior to joining the applicant, Mr. Schnaak was employed by Corporate Express Airlines as its Vice President-Flight Operations and Director of Operations. Previously, Mr. Schnaak held various positions, including as Director of Safety, Director of Flight Administration, Chief Pilot, and pilot, for American Eagle Airlines (1987-1996), and as a pilot with two air ambulatory services (1984-1987).

Mr. James E. Nedzweckas, an Airframe and Powerplant Mechanic, serves as Shuttle America's Chief Inspector. After serving for approximately six years as an avionics technician in the United States Navy, Mr. Nedzweckas joined Rocky Mountain Helicopters as a mechanic where he worked until joining Mesa Air as a mechanic in November 1989. Mr. Nedzweckas worked for different divisions of Mesa Air in progressively more responsible positions until joining the applicant in May 1998. Immediately prior to leaving Mesa Air, Mr. Nedzweckas served as its Director of Technical Support.

Shuttle Ventures. Mr. Reed is Senior Vice President and Managing Director of the Connecticut Development Authority.

Serving as Shuttle America's Vice President and Director of Maintenance is Mr. Charles A. Miller, an Airframe and Powerplant Mechanic with almost 40 years of military and civilian aircraft maintenance experience. After serving for 20 years as an aviation electrician in the United States Navy, Mr. Miller joined Scheduled Skyways as its maintenance foreman in 1979. Since that time, he has worked, primarily as Director of Maintenance, for various air carriers and fixed-base operators including Eastern Metro Express, Northwest Airlink, Atlantic Southeast Airlines, Air Midwest, and Mesa Air.

Mr. Timothy J. Cwik, an Airline Transport Pilot with over 14,000 total flight hours, serves as Shuttle America's Chief Pilot. Mr. Cwik began his aviation career in 1977 as a corporate pilot with Gulf Western Corporation. During the next 20 years, Mr. Cwik held pilot positions with various air carriers including Aeromech Airlines, Ransome Airlines, Pan Am Express,⁵ Pan American World Airways, and, most recently, Trans World Express where he also served as its Director of Information Services.

Serving as Shuttle America's Director of Safety is Mr. Luke A. Smith, an Airline Transport Pilot with 16 years of aviation-related experience. Mr. Smith began his aviation career in 1982 as Director of Training for Lake Aircraft, an aircraft manufacturer. In 1987, he joined SMA Airlines as its Director of Flight Operations, a position he held until 1993. Since then, he has served as Chief Flight Instructor for SEAero, a flight school,⁶ Captain for Cardinal Airlines, a foreign (Dominica, West Indies) air carrier, and Assistant Chief Pilot for Corporate Midway Airline.

In view of the experience and background of the applicant's key personnel, we tentatively conclude that Shuttle America has demonstrated that it has the management skills and technical ability to conduct its proposed service.⁷

⁵ While at Pan Am Express, Mr. Cwik also served as its Chief Pilot.

⁶ Mr. Smith's position with SEAero has been held on a self-employed, part-time basis and will continue as such while he serves as Shuttle America's Director of Safety.

⁷ Before authorizing a carrier to conduct air transportation operations, the FAA also evaluates certain of the carrier's key personnel with respect to the minimum qualifications for those positions as prescribed in the FARs. The FAA's evaluation of these key personnel provides an added practical and in-person test of the skills and technical ability of these individuals.

Financial Plan and Operating Proposal

If granted the certificate authority it seeks, Shuttle America intends to commence scheduled passenger operations initially serving medium-sized cities and secondary airports at major cities in the Northeast and Mid-Atlantic states utilizing 50-seat Bombardier Dash 8-300 aircraft. Shuttle America intends to expand its operations gradually throughout its first year of operations, beginning with two aircraft serving two city pairs with 104 round trip departures in each city pair per month. By the end of its first full year of operations, the applicant plans to be operating nine aircraft serving nine city pairs with 53 to 106 round trip departures in each city pair per month.

In addition to various financial statements that reflect the developmental state of the applicant,⁸ Shuttle America has provided detailed forecasts of its anticipated pre-operating expenses and its operating expenses for its first year of operations. We have reviewed Shuttle America's first year expense forecasts, on a unit basis, and find that they appear to be reasonable.

As of June 30, 1998, Shuttle America had incurred approximately \$957,000 in start-up expenses, the majority of which had already been paid. Shuttle America anticipates that it will incur approximately \$2.68 million in additional start-up costs,⁹ and another \$5.24 million in operating expenses during three months of normal certificated operations. Thus, Shuttle America will need approximately \$7.92 million in additional funds to meet our financial fitness criteria.¹⁰

Shuttle America has already completed the bulk of its initial financing, raising \$550,000 through the sale of common stock to its management and \$5.25 million through the private placement sale of its preferred stock.¹¹ In addition, the Connecticut Development Authority has committed \$3.0 million in debt financing to the applicant.¹² Third party verification of Shuttle America's available funds was supplied by BankBoston.

⁸ Shuttle America provided balance sheets reflecting its financial position as at December 31, 1996 and 1997, and March 31 and June 30, 1998. Additionally, it provided income statements for Calendar Years 1996 and 1997, and the three months ended March 31 and June 30, 1998.

⁹ This amount includes cash deposits and other capital expenditures Shuttle America will incur prior to commencement of revenue flight operations.

¹⁰ In evaluating an applicant's financial fitness, the Department generally asks that the company have available to it sufficient resources to cover all pre-operating costs plus a working capital reserve equal to the operating costs that would be incurred in three months of normal certificated operations. Because projected operations during one or more of the first three months of anticipated actual air transportation services frequently do not include all costs of operations that will be incurred during a normal period of operations, it is our practice to base our three-month test on one quarter of the first year's operating cost forecast. In calculating available resources, projected revenues may not be used.

¹¹ The funds received from management's purchase of Shuttle America's common stock, as well as a small portion of its other funds, have been used to pay pre-operating expenses already incurred.

¹² Of this amount, \$1.0 million remains outstanding with its release contingent upon Shuttle America's commencement of actual flight operations and completion of certain other steps.

In light of the company's funding, we tentatively conclude that Shuttle America will have sufficient financial resources available to it to enable it to commence its proposed scheduled passenger operations without posing an undue risk to consumers or their funds.

Compliance Disposition

We also tentatively conclude that Shuttle America has the proper regard for the laws and regulations governing its services to ensure that its aircraft and personnel conform to applicable safety standards and that acceptable consumer relations practices will be followed.

Shuttle America has stated that there are no actions or outstanding judgments against it, its owners, or its key personnel, nor have there been any charges of unfair, deceptive or anti-competitive business practices, or of fraud, felony or antitrust violations brought against any of these parties in the past ten years. Shuttle America further stated that there are no pending investigations, enforcement actions, or formal complaints filed by the Department against it, its key personnel, or persons having a substantial interest in it with respect to compliance with the statute or the Department's regulations.

Further, our search of the Department's records found no compliance problems with Shuttle America, its owners, or its key personnel. In addition, the FAA has advised us that the company has applied for certification under Part 121 of the Federal Aviation Regulations and that it knows of no reason why we should act unfavorably on the company's application.

CITIZENSHIP

Section 41102 requires that certificates to engage in air transportation be held only by citizens of the United States as defined in 49 U.S.C. 40102(a)(15). That section requires that the president and two-thirds of the Board of Directors and other managing officers be U.S. citizens and that at least 75 percent of the outstanding voting stock be owned by U.S. citizens. We have also interpreted the statute to mean that, as a factual matter, the carrier must actually be controlled by U.S. citizens.

The only non-U.S. citizen investor in Shuttle America is CIBC Wood Gundy, a citizen of Canada, which holds 14.3 percent of Shuttle America's voting convertible preferred stock and therefore 11.1 percent of all of Shuttle America's outstanding voting stock.¹³ All of Shuttle America's directors are citizens of the United States and are nominees of U.S. citizens. In addition, all of the company's key personnel are U.S. citizens and Shuttle America has provided an affidavit attesting that it is a citizen of the United States within the meaning of the statute and that it is actually controlled by U.S. citizens. Finally, our review of the applicant's citizenship has uncovered no reason to suggest that control of Shuttle America rests with non-U.S. citizens.

Based on the above, we tentatively conclude that Shuttle America is a citizen of the United States and is fit, willing, and able to conduct the interstate scheduled passenger operations proposed in its application.

¹³ If all outstanding warrants are exercised, CIBC Wood Gundy's voting interests in Shuttle America would be reduced to 9.1 percent.

OBJECTIONS

We will give interested persons 14 calendar days following the service date of this order to show cause why the tentative findings and conclusions set forth here should not be made final; answers to objections will be due within 7 calendar days thereafter. We expect such persons to direct their objections, if any, to the application and points at issue and to support such objections with detailed economic analyses. If an oral evidentiary hearing or discovery procedures are requested, the objector should state in detail why such a hearing or discovery is considered necessary, and what material issues of decisional fact the objector would expect to establish through a hearing or discovery that cannot be established in written pleadings. The objector should consider whether discovery procedures alone would be sufficient to resolve material issues of decisional fact. If so, the type of procedure should be specified (*See* Part 302, Rules 19 and 20); if not, the reasons why not should be explained. We will not entertain general, vague, or unsupported objections. If no substantive objections are filed, we will issue an order that will make final our tentative findings and conclusions with respect to Shuttle America's fitness and certification.

CERTIFICATE CONDITIONS & LIMITATIONS

If Shuttle America is found fit and issued the certificate it seeks, its authority will not become effective until the company has fulfilled all requirements for effectiveness as set forth in the terms and conditions attached to its certificate. Among other things, this includes our receipt of evidence that Shuttle America has been certified by the FAA to engage in the subject operations, a fully-executed OST Form 4520 evidencing liability insurance coverage that meets the requirements of Part 205 of our rules, and a revised list of pre-operating expenses already paid and those remaining to be paid, along with third-party verification that the company continues to have available, either through deposits in its own name or a line-of-credit, sufficient funds to meet our financial fitness criteria.

Furthermore, we remind Shuttle America of the requirements of 49 U.S.C. 41110(e). Specifically, that section requires that, once a carrier is found fit initially, it must remain fit in order to hold its authority. To be assured that certificated air carriers continue to be fit after effective authority has been issued to them, we require that they supply information describing any subsequent substantial changes they may undergo in areas affecting fitness.

Our tentative findings stated above are based on the operating plan described in Shuttle America's application which utilizes nine aircraft with fewer than 60-passenger seats each. These findings might no longer apply if the company were to substantially change the scope or nature of its operations through the introduction of significantly more aircraft or aircraft having more than 60-passenger seats. Therefore, once the applicant's certificate becomes effective, should Shuttle America propose to acquire any aircraft beyond the nine 50-seat Dash 8-300 aircraft referenced in its application, it must notify the Department in writing at least 45 days in advance and demonstrate its fitness for such operations prior to implementing service with any additional aircraft or with aircraft having more than 60-passenger seats. Furthermore, should Shuttle America propose other substantial changes in its ownership, management, or operations,

it must first comply with the requirements of section 204.5 of our rules.¹⁴ The compliance of the company with this requirement is essential if we are to carry out our responsibilities under section 41110(e).¹⁵

Moreover, to aid the Department in monitoring the fitness of new carriers, we have decided to impose a special reporting requirement on all start-up carriers. Specifically, within 45 days of the end of the Shuttle America's first year of actual flight operations, it should submit to the Air Carrier Fitness Division a first year progress report. The report should include a description of the carrier's current operations (number and type of aircraft, principal markets served, total number of full-time and part-time employees), a summary of how these operations have changed during the year, a discussion of any changes it anticipates from its current operations during its second year, current financial statements,¹⁶ and a listing of current senior management and key technical personnel. The carrier should also be prepared to meet with staff members of the Fitness Division to discuss its current and future operations.

ACCORDINGLY,

1. We direct all interested persons to show cause why we should not issue orders making final the tentative findings and conclusions stated above and award a certificate to Shuttle America Corporation authorizing it to engage in interstate scheduled air transportation of persons, property, and mail, subject to the attached specimen Terms, Conditions, and Limitations.
2. We direct any interested persons having objections to the issuance of orders making final any of the proposed findings, conclusions, or the certificate award set forth here to file them with Department of Transportation Dockets, Department of Transportation, 400 Seventh Street, SW, Washington, D.C. 20590, in Docket OST-98-3876, and serve them upon all persons listed in Attachment A no later than 14 calendar days after the service date of this order; answers to objections shall be filed no later than 7 calendar days thereafter.

¹⁴ The carrier may contact our Air Carrier Fitness Division to report proposed substantial changes in its operations, ownership, or management, and to determine what additional information, if any, will be required under section 204.5. If the carrier fails to file the information or if the information fails to demonstrate that the carrier will continue to be fit upon implementation of the substantial change, the Department may take such action as is appropriate, including enforcement action or steps to modify, suspend, or revoke the carrier's certificate authority.

¹⁵ We also remind Shuttle America about the requirements of section 204.7 of our rules. This section provides, among other things, that (1) the certificate authority granted to a company shall be revoked if the company does not commence actual flying operations under that authority within one year of the date of the Department's determination of its fitness; (2) if the company commences operations for which it was found fit and subsequently ceases such operations, it may not resume certificated operations unless its fitness has been redetermined; and (3) if the company does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

¹⁶ These financial statements should include a balance sheet as of the end of the company's first full year of actual flight operations and a twelve month income statement ending that same date.

3. If timely and properly supported objections are filed, we will accord full consideration to the matters or issues raised by the objections before we take further action.¹⁷
4. In the event that no objections are filed, we will consider all further procedural steps to be waived and we will enter an order making final our tentative findings and conclusions.
5. We will serve a copy of this order on the persons listed in Attachment A.
6. We will publish a summary of this order in the Federal Register.

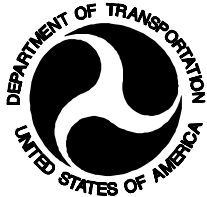
By:

CHARLES A. HUNNICUTT
Assistant Secretary for Aviation
and International Affairs

(SEAL)

*An electronic version of this document is available on the World Wide Web at:
<http://dms.dot.gov>*

¹⁷ Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.



SPECIMEN

Terms, Conditions, and Limitations

SHUTTLE AMERICA CORPORATION

is authorized to engage in interstate air transportation of persons, property, and mail between any point in any State, territory, or possession of the United States or the District of Columbia, and any other point in any of those entities.

This authority is subject to the following provisions:

- (1) The authority to operate under this certificate will not become effective until six (business) days after the Department has received the following documents; provided, however, that the Department may stay the effectiveness of this authority at any time prior to that date:
 - (a) A copy of the holder's Air Carrier Certificate and Operations Specifications authorizing such operations from the Federal Aviation Administration (FAA).
 - (b) A certificate of insurance on OST Form 6410 evidencing liability insurance coverage meeting the requirements of 14 CFR 205.5(b) for all of its aircraft.
 - (c) A statement of any changes the holder has undergone in its ownership, key personnel, operating plans, financial posture, or compliance history, since the date of the Show Cause Order in this case.
 - (d) A revised list of pre-operating expenses already paid and those remaining to be paid, as well as independent verification that the holder has available to it funds sufficient to cover any remaining pre-operating expenses and to provide a working capital reserve equal to the operating costs that would be incurred in three months of operations.
- (2) Pending receipt of effective authority, the holder may not accept payment of any kind (i.e., cash, check, or credit card) or issue tickets for the operations proposed under this certificate, and any advertisement or listing of flights by the

holder must prominently state: "This service is subject to receipt of government operating authority."

(3) The holder shall at all times conduct its operations in accordance with the regulations prescribed by the Department of Transportation for the services authorized by this certificate, and with such other reasonable terms, conditions, and limitations as the Department of Transportation may prescribe in the public interest.

(4) The holder's authority is effective only to the extent that such operations are also authorized by the FAA.

(5) The holder shall at all times remain a "Citizen of the United States" as required by 49 U.S.C. 40102(a)(15).

(6) The holder shall maintain in effect liability insurance coverage as required under 14 CFR Part 205. Failure to maintain such insurance coverage will render a certificate ineffective, and this or other failure to comply with the provisions of Subtitle VII of Title 49 of the United States Code or the Department's regulations shall be sufficient grounds to revoke this certificate.

(7) In the event that the holder receives effective scheduled passenger authority, the following additional conditions will apply:

(a) The holder may reduce or terminate service at any point or between any two points, subject to compliance with the provisions of 49 U.S.C. 41734 and all orders and regulations issued by the Department of Transportation under that section.

(b) The holder may not provide scheduled passenger air transportation to or from Dallas (Love Field), Texas, except within the limits set forth in section 29 of the International Air Transportation Competition Act of 1979, as amended by section 337 of the Department of Transportation and Related Agencies Appropriations Act, 1998.

(8) Should the holder propose any substantial changes in its ownership, management, or operations (as that term is defined in 14 CFR 204.2(n)), it must first comply with the requirements of 14 CFR 204.5.

(9) In the event that the holder does not commence actual flying operations under this certificate within one year of the date of the Department's determination of its fitness, its authority shall be revoked for dormancy. Further, in the event that the holder commences operations for which it was found "fit, willing, and able" and subsequently ceases all such operations, its authority under this certificate shall be suspended under the terms of 14 CFR 204.7 and the holder may neither recommence nor advertise such operations unless its fitness to do so has been redetermined by the Department. Moreover, if the holder does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

SERVICE LIST FOR SHUTTLE AMERICA CORPORATION

Attachment A

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